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**U.S. DISTRICT COURT FOR THE
SOUTHERN DISTRICT OF CALIFORNIA**

**IN RE PORTFOLIO RECOVERY
ASSOCIATES, LLC
TELEPHONE CONSUMER
PROTECTION ACT
LITIGATION**

Case No.: 11-MD-02295-JAH-
BGS

Hon. John A. Houston
Hon. Bernard G. Skomal

**JOINT MOTION TO
DISMISS WITH PREJUDICE**

This Document Relates to *CLARK v.
PORTFOLIO RECOVERY
ASSOCIATES, LLC ET AL.*, Case No.
3:16-cv-02838-JAH-BGS

IT IS HEREBY STIPULATED AND AGREED, by and between all parties to *Clark v. Portfolio Associates, LLC*, Case No. 3:16-cv-02838-JAH-BGS (“the *Clark* action”), namely Plaintiff Robert Clark and Defendants Portfolio Recovery Associates, LLC and AT&T Mobility LLC,¹ through their respective

¹ The complaint incorrectly identifies AT&T Mobility by the brand name “AT&T.”

1 counsel, that the *Clark* action, including each claim and count therein asserted by
2 Plaintiff against the Defendants, shall be dismissed with prejudice pursuant to a
3 settlement and Federal Rule of Civil Procedure 41(a)(1)(A)(ii), and with each party
4 to bear its own costs and attorneys' fees.

5 The parties to the *Clark* action respectfully request that the Court terminate
6 the *Clark* action by valid order pursuant to this Joint Motion to Dismiss with
7 Prejudice and direct the Clerk of this Court to transmit a copy of the same to the
8 Clerk of the United States Judicial Panel on Multidistrict Litigation pursuant to
9 J.P.M.L. Rule 10.1.
10

11
12 Dated: June 25, 2019

Respectfully submitted,

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14 /s/ Hans J. Germann

Hans J. Germann

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CERTIFICATE OF SERVICE

I, Hans Germann, counsel for Defendant AT&T, hereby certify that service of the foregoing JOINT MOTION TO DISMISS WITH PREJUDICE was filed electronically and sent via email through the CM/ECF system to those parties who are registered Filing Users; and counsel were copied on the email transmitting the Proposed Order to the Honorable John A. Houston.

I further certify that the foregoing document and a copy of the Proposed Order were also served upon the parties below by causing copies of the same to be placed in the United States Mail, postage prepaid, and sent to their last known address as follows:

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Respectfully submitted,

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